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Attorney for Defendant
JACOB JACOBSEN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACOB JACOBSEN,

Defendant.

Case No. 1:22-cr-00304-TLN-BAM

STIPULATION AND ORDER
TO CONTINUE SENTENCING AND RE-SET
DEADLINES FOR OBJECTIONS.

PROPOSED DATE: December 1, 2025
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

In the weeks since the Draft PSR was filed on August 12, 2025, defense counsel has been unable to complete a draft of the informal objections. Counsel's inability to complete the informal objections is due to the fact that – in addition to the normal press of business – defense counsel had to prepare for and complete oral arguments in California's First District Court of Appeal in the matter of *People v. Robles* (A170693) and in the Fifth District Court of Appeal in the matter of *In re Grinder* (F088488). In addition, during that time period, counsel filed appellant's opening brief in the California's Fifth District Court of Appeal in the matter of *People v. Lopez* (F089230).

1 Further, In the weeks between the filing of this stipulation and the date currently set for
2 sentencing in Mr. Jacobsen's case, defense counsel must contend with upcoming filing deadlines
3 in the matters of *People v. Currenton* (3rd. Dist. Court of Appeal No. C101945 - Appellant's
4 Opening Brief), *People v. Gutierrez* (5th Dist. Court of Appeal No. F089019 - Court ordered
5 supplemental briefing) and *People v. Robles* (1st Dist. No. A170693 - Petition for Review). Each
6 of these matters required counsel's time and attention for significant periods over the course of
7 the last two weeks.

9 Defense counsel is scheduled to begin a *Kelly-Frye* hearing on the issue of ballistic
10 comparison evidence in the matter of *People v. Monge* (Merced County Superior Court No.
11 24CR-01898) on August 28, 2025, which may last for more than one session. Jury trial of the
12 Monge case (charged as a first-degree homicide) is currently scheduled to commence on
13 September 9, 2025, and last for approximately 4 weeks. The statutory deadline for trial in the
14 Monge matter is on September 23, 2025. Additionally, defense counsel is scheduled to attend a
15 meeting with the Merced County District Attorney's Death Panel on September 2, 2025, to
16 discuss whether the government will seek a death sentence in the ongoing matter of *People v.*
17 *Jesus Salgado* (22cr-05188). Each of these matters requires extensive pre-hearing preparation.

19 In light of the foregoing, IT IS HEREBY STIPULATED by and between the parties
20 hereto, through their respective counsel, that the sentencing hearing in this matter currently
21 scheduled for September 22, 2025, be continued to December 1, 2025. The parties further
22 stipulate that the deadline for filing objections be reopened, and new dates set as follows:

24
25 11/3/2025: Informal objections due.
26 11/17/2025: Final Revised PSR filed with the Court and parties.
27 11/24/2025: Formal objections filed with the Court.
28 12/1/2025: Sentencing.

1 Counsel for the government and the assigned USPO have agreed to reopening the
2 informal objections process and to the proposed new date for sentencing. Defense counsel will
3 make every effort to avoid the need for another continuance of the new proposed date.
4

5
6 IT IS SO SIPULATED:

7 Eric Grant
8 United States Attorney

9 DATED: 8/28/25

10 /s/David Gappa
11 DAVID GAPPA
12 Assistant United States Attorney
13 Attorney for Plaintiff

14 DATED: 8/28/25

15 /s/ Douglas Foster
16 DOUGLAS C. FOSTER
17 Law Offices of Douglas C. Foster
18 Attorney for Defendant
19 JACOB JACOBSEN
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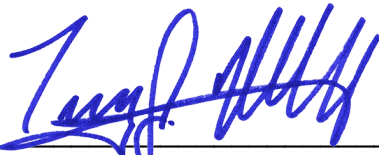
ORDER

The court has reviewed and considered the stipulation filed by the parties on August 28, 2025, and reviewed the record of this case. For the reasons stated in the stipulation, the request to continue sentencing is GRANTED.

IT IS SO ORDERED that sentencing in this matter shall be continued to December 1, 2025, at 9:30 a.m. IT IS FURTHER ORDERED that the deadlines for filing of objections shall be reopened and the schedule for filing be reset as follows:

11/3/2025: Informal objections due.
11/17/2025: Final Revised PSR filed with the Court and parties.
11/24/2025: Formal objections filed with the Court.
12/1/2025: Sentencing at 9:30 a.m., in Courtroom 5.

DATED: September 2, 2025



TROY L. NUNLEY
CHIEF UNITED STATES DISTRICT JUDGE